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*Counsel for Plaintiff Junhan Jeong*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

JUNHAN JEONG, individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

NEXO FINANCIAL LLC, NEXO FINANCIAL  
SERVICES LTD., NEXO SERVICES OÜ, NEXO  
AG, and NEXO CAPITAL INC.,

Defendants.

No. 5:21-cv-02392

**JOINT STIPULATION AND  
[PROPOSED] ORDER**

Plaintiff Junhan Jeong, individually and on behalf of all others similarly situated, and  
Defendants Nexo Financial LLC, Nexo Financial Services Ltd., Nexo Services OÜ, Nexo AG, and  
Nexo Capital Inc. (collectively, “Defendants”), by and through their undersigned counsel, hereby  
stipulate as follows:

**STIPULATION**

1 WHEREAS, on April 1, 2021, Plaintiff filed a class action complaint against Defendants  
2 (ECF No. 1);

3 WHEREAS, on April 12, 2021, Defendants' counsel executed waivers of the service of  
4 summons on behalf of each Defendant;

5 WHEREAS, the parties have conferred regarding a briefing schedule for Defendants'  
6 anticipated motion to dismiss;

7 IT IS ACCORDINGLY HEREBY STIPULATED AND AGREED, by and between the  
8 undersigned counsel for Plaintiff and Defendants, subject to the Court's approval, as follows:

9 1. Defendants shall answer, move against, or otherwise respond to the Complaint no  
10 later than July 12, 2021;

11 2. Plaintiff shall oppose any motion to dismiss no later than August 26, 2021; and

12 3. Defendants shall file any reply in further support of any motion to dismiss no later  
13 than September 27, 2021.

14 Dated: April 15, 2021

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*Counsel for Plaintiff*

STIPULATION

1 PURSUANT TO STIPULATION, IT IS SO ORDERED:

2 Dated: \_\_\_\_\_, 2021

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Hon. Nathanael M. Cousins

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STIPULATION